

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

NANCY J. CLINE, Personal Representative of  
THE ESTATE OF GLEN H. CLINE, JR.,  
Deceased, et al

\*

\*

Plaintiffs

\*

v.

\*

CASE NUMBER: JFM-03-CV-529

JOHN JAMES CHRISTY

\*

And

AGAPE HARVESTER CHURCH, INC.

\*

Defendants

\*

\* \* \* \* \*

DEFENDANT'S FEDERAL RULE CIVIL PROCEDURE 26(a)(1)  
INITIAL DISCLOSURES

Now come the Defendants, John James Christy and Agape Harvester Church, Inc., by their attorney, Lawrence E. Ballantine, and pursuant to Fed. R. Civ. P. 26(a)(1) make these initial disclosures:

A

1. Any and all witnesses listed, disclosed or identified by Plaintiffs in the previous Washington County litigation relative to the above-referenced matter (Cline, et al. v. Christy, et al., Washington County Circuit Court Case No.: 21-C-02-013505).
2. NANCY CLINE  
400 Staton  
Bay City, Michigan 48708
3. JOSH H. CLINE  
400 Staton  
Bay City, Michigan 48708
4. TERRY TUNEY  
1769 Riverwood  
Alger, Michigan 48610
5. DOROTHY MILLER  
4900 East Tawas Road  
M-55, Route 2  
Prescott, Michigan 48753

6. BRIAN CLINE  
3635 Greenwood  
Prescott, Michigan 48756
7. RICK CLINE  
City Road  
Lupton, Michigan 48635
8. MSP Cpl. BENJAMIN TOWNES and TFC ROBERT O. FRALEY  
MSP BARRACKS O  
18345 Col. Henry K. Douglas Drive  
Hagerstown, MD 21140
9. DR. EDWARD PITTO Medical Examiner for Washington County
10. J. LARON LOCKET, M.D. and JACQUELINE L. PARAI, M.D., State Medical  
Examiner's Office
11. JOHN E. HERKO  
11915 South Street  
P.O. Box 302  
Libertytown, MD 21724
12. HERMAN MILLER  
105 Bluff Terrace  
Silver Spring, MD 20902
13. THOMAS BOWERS  
18 West Water Street  
P.O. Box 95  
Smithsburg, MD 21783-0095
14. Gregory M. Manning, GMA, Inc.  
P.O. Box 320  
Centreville, MD 21617
15. Defendant intends to call someone from the State Highway Administration to testify as to the actual layout of the accident scene, including but not limited to the width of the traveled lanes on the interstate, the width of the shoulder where the decedent's vehicle was parked, the width of the shoulder on the approach to the scene of the accident, the length of the bridge over Interstate 81 and the width of the shoulder on the east side of the bridge all the way down to the lanes merging from northbound Interstate 81. The witness will testify as to these measurements and what they were on the date this accident occurred. The identity of the individual is at this time unknown.

B

1. Any and all documents or other evidentiary material listed, disclosed or identified by Plaintiffs in the previous Washington County litigation relative to the above-referenced

matter (Cline, et al. v. Christy, et al., Washington County Circuit Court Case No.: 21-C-02-013505).

2. Any Medical Examiners and/or Autopsy Report.
3. Any Police Report generated by the Maryland State Police-Hagerstown Barracks or otherwise.
4. Photographs in possession of Plaintiffs' counsel, Defendants' counsel and respective party experts'.
5. Accident Reconstructionist Reports-Maryland State Police and expert (Plaintiff and Defense).
6. All transcripts of depositions taken in said prior State litigation.
7. Fire records.
8. Economist's report.
9. Insurance Company damage appraisal.
10. Video tape recording.
11. Discovery requests and party responses thereto used in said prior State litigation.
12. Any pleadings, motions or other documents of record in said prior State litigation.

C

Not applicable.

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LAWRENCE E. BALLANTINE  
Trial Bar No. 01948  
Attorney for Defendant  
1 W. Pennsylvania Ave., Ste. 500  
Towson, Maryland 21204-5025  
(410) 832-8012

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, That on this 21st day of July, 2003, a copy of the foregoing Defendant's Federal Rule Civil Procedure 26(a)(1) Initial Disclosures, was mailed, postage prepaid, to **Leonard A. Orman, P.A.**, 26 South Street, Baltimore, Maryland 21202; **Timothy R. Freel, Esquire**, **Freel & Freel, P.C.**, 231 Newman Street, East Tawas, Michigan 48730, and **Elliot N. Lewis, Esquire**, **Elliot N. Lewis, P.A.**, 1 East Lexington Street, Suite 201, Baltimore, Maryland 21202, Attorneys for Plaintiffs.

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LAWRENCE E. BALLANTINE

LEB/dmt